

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:

**Anthony Todd Catania**

Debtor.

**Case No. 19-14826-JDL  
Chapter 13**

**OBJECTION TO CONFIRMATION OF AMENDED  
CHAPTER 13 PLAN COMBINED WITH REQUEST FOR  
CONVERSION OR DISMISSAL IF CONFIRMATION IS DENIED**

COMES NOW John Hardeman, Chapter 13 Trustee ("Trustee"), and pursuant to 11 U.S.C. Sections 1322, 1325 and 1326, objects to confirmation of the debtor's Amended Chapter 13 Plan ("plan" or "amended plan"). In support of his Objection to Confirmation, the Trustee states as follows:

\* The plan as proposed is not feasible in that the total of all monthly amounts proposed to be paid to creditors during the first two month(s) of the plan exceeds the proposed monthly plan payment. In accordance with 11 U.S.C. Section 1322(a)(1), a chapter 13 plan must provide for the submission of such portion of the income of the debtor as is necessary for the execution of the plan. The amount proposed to be paid into the plan by the debtor during the first two months of the plan is not sufficient to appropriately fund the plan.

\* The debtor has not provided the Trustee with information required in connection with the review of disposable income. Without the required information, the Trustee is unable to determine whether the debtor is committing all disposable income toward the payment of unsecured creditors in accordance with 11 U.S.C. Section 1325(b). As a result, the Trustee objects to the plan based upon the failure to commit all disposable income to the payment of unsecured debts. The information initially needed in order to review disposable income is paystubs.

WHEREFORE, for the reasons stated above, the Trustee respectfully requests that confirmation of the amended plan be denied and that the Court grant such other relief as is warranted including, but not limited to, conversion or dismissal of the case pursuant to 11 U.S.C. Section 1307(c).

Respectfully Submitted,

s/John Hardeman

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**CERTIFICATE OF MAILING**

This is to certify that on February 12, 2020, a true and correct copy of the foregoing document was served by U.S. Mail, first class, postage prepaid, on the following:

Anthony Todd Catania  
16200 Royal Crest Lane  
Edmond, OK 73013

s/John Hardeman

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John Hardeman, Trustee

JS